

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

\*

v.

\*

Criminal No.: PX-18-631

\*

TAEYAN WILLIAMS

\* \* \* \* \*

**MOTION FOR REVIEW OF DETENTION BY AGREEMENT**

Now Comes, the defendant, Taeyan Williams by his attorney Alfred Guillaume III, and respectfully requests pursuant to 18 U.S.C. §3145(b) that this Honorable Court schedule this matter for a Detention Hearing, and in support therefore, states as follows:

1. That on May 7, 2019, Mr. Williams had an initial appearance on an indictment charging him with a narcotics conspiracy in violation of 21 U.S.C. 846.
2. That on May 7, 2019, the defendant consented to detention without prejudice.
3. Mr. Smith has extensive familial and community ties to this area.
4. The Bail Reform Act requires the court to “order the pretrial release of the person...subject to the least restrictive further condition, or combination of conditions...that will reasonably assure the appearance of the person...and the safety of any other person and the community...”<sup>1</sup>
5. Mr. Williams has a third-party custodian that is each willing to “assume supervision [of him] and to report any violation of a release condition to the court.”<sup>2</sup>
6. Mr. Williams is housed at the Central Treatment Facility (“CTF”), where (as of the date of this motion) there are at least twelve confirmed cases of Covid-19 in the inmate

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<sup>1</sup> 18 U.S.C. §3142(c)(1)(A)(B)

<sup>2</sup> 18 U.S.C. §3142(c)(1)(B)

population.<sup>3</sup>

7. The Covid-19 public health emergency in the United States, is even more pronounced in the nations prison system, particularly in the facility in which Mr. Williams is housed.
8. Social distancing, a universal recommendation of health care professionals in this crisis is all but impossible in a pretrial detention facility, especially for detainees.

WHEREFORE, it is respectfully requested that this matter be scheduled for a detention hearing.

Respectfully submitted,

/S/

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Alfred Guillaume III, Esq.

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<sup>3</sup> The first cases of Covid-19 originated in the Correctional Treatment Facility (“CTF”), an adjunct facility, and many of those infected inmates are now currently being housed in CDF.

**CERTIFICATE OF SERVICE**

I HEREBY certify that on this 3rd of April, 2020, a copy of the foregoing was delivered by electronic mail to the United States Attorney's Office and all parties of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Alfred Guillaume III, Esq.